

DECISION MEMORANDUM

**TO: COMMISSIONER ANDERSON
COMMISSIONER HAMMOND
COMMISSIONER LODGE
COMMISSION SECRETARY
COMMISSION STAFF
LEGAL**

**FROM: MICHAEL DUVAL
DEPUTY ATTORNEY GENERAL**

DATE: MARCH 5, 2024

**SUBJECT: IN THE MATTER OF ROCKY MOUNTAIN POWER’S APPLICATION
REQUESTING AUTHORIZATION TO UPDATE THE WIND AND SOLAR
INTEGRATION RATE FOR SMALL POWER GENERATION
QUALIFYING FACILITIES; CASE NO. PAC-E-23-24.**

On November 29, 2023, Rocky Mountain Power, a division of PacifiCorp (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) for authority to adjust the wind and solar integration rate applicable to new power purchase agreements (“PPAs”) between the Company and wind and solar qualifying facilities (“QFs”) (“Application”).

On January 2, 2024, the Commission issued a Notice of Application and Notice of Intervention Deadline. Order No. 36051. No party intervened.

THE APPLICATION

The Company requested authorization to decrease the wind integration rate from \$1.25 to \$1.18 per megawatt-hour (“MWh”) for wind-powered QFs. The Company also requested authorization to increase the solar integration rate from \$0.96 to \$1.40 per MWh for solar-powered QFs.¹

The Company stated the proposed changes are due to the integration costs of wind and solar power compared to published avoided cost rates. However, the Company noted that an exception to this default practice of determining the price occurs when the QF delivers energy to the Company on a firm hourly schedule as specified in a PPA.

¹ The Company specifically requested that the proposed wind and solar integration rate be priced “in 2024 dollars.” Application at 1, 6.

STAFF RECOMMENDATION

After discussing the proposed schedule with the Company, Staff recommends the Commission issue a Notice of Modified Procedure establishing a 21-day public comment deadline, and a 14-day Company reply deadline.

COMMISSION DECISION

Does the Commission wish to issue a Notice of Modified Procedure establishing a 21-day public comment deadline, and a 14-day Company reply deadline.?



Michael Duval
Deputy Attorney General

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